

# **EXHIBIT C**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>LOUIS WENDELL AND MELVIN WENDELL,</b>	§ § § §	
<b>Plaintiff,</b>	§ § § §	<b>Civil Action No.</b>
<b>v.</b>	§ § § §	
<b>MORTGAGE ASSETS MANAGEMENT, LLC C/O PHH MORTGAGE CORPORATION,</b>	§ § § §	
<b>Defendant.</b>	§ § § §	

**DECLARATION OF NICHOLAS M. FRAME**

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the following statements are true and correct:

1. My name is Nicholas M. Frame I am over the age of 21 years and am fully competent to make this Declaration. All statements of fact made herein are true, correct, and within my personal knowledge.
2. I am an attorney for Mackie Wolf Zientz & Mann, P.C., attorneys for Mortgage Asset Management, LLC c/o PHH Mortgage Corporation (“Defendant”).
3. I certify that on June 15, 2022, my firm searched for the Bexar County Appraisal District’s valuation of 4718 Lyceum Drive, San Antonio, Texas 78229. We found the appraisal record for the Property. A true and correct copy of the appraisal record is attached hereto as Exhibit C-1.
4. I certify the following documents attached hereto are true and correct copies of the originals, which I obtained from the Appraisal District website for Bexar County. This document is identified as an exhibit to this Declaration as indicated below:

C-1 Data Sheet from the Bexar County, Texas Central Appraisal District web-site on June 15, 2022.

This document is incorporated by reference for all purposes.

FURTHER DECLARANT SAYETH NOT."

SIGNED AND DECLARED on June 16, 2022.



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NICHOLAS M. FRAME

# **EXHIBIT C-1**

# Bexar CAD

## Property Search Results > 512493 ZULUAGA LUZ E for Tax Year: 2022 Year 2022

### Property

#### Account

Property ID: [REDACTED] Legal Description: NCB 12790 BLK 10 LOT 27 GLENOAKS PARKS SUBD UNIT 2  
Geographic ID: 12790-010-0270 Zoning: R-5  
Type: Real Agent Code:  
Property Use Code: 001  
Property Use Description: Single Family

#### Protest

Protest Status:

Informal Date:

Formal Date:

#### Location

Address: 4718 LYCEUM DR Mapsco: 580F3  
SAN ANTONIO, TX 78229  
Neighborhood: GLENOAKS PARK Map ID:  
Neighborhood CD: 99041 E-File Eligible

#### Owner

Name: ZULUAGA LUZ E Owner ID: [REDACTED]  
Mailing Address: 1708 WINDING VW % Ownership: 100.0000000000%  
SAN ANTONIO, TX 78260  
Exemptions:

### Values

(+) Improvement Homesite Value:	+	\$173,070
(+) Improvement Non-Homesite Value:	+	\$0
(+) Land Homesite Value:	+	\$56,440
(+) Land Non-Homesite Value:	+	\$0 Ag / Timber Use Value
(+) Agricultural Market Valuation:	+	\$0 \$0
(+) Timber Market Valuation:	+	\$0 \$0
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(=) Market Value:	=	\$229,510
(-) Ag or Timber Use Value Reduction:	-	\$0
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(=) Appraised Value:	=	\$229,510
(-) HS Cap:	-	\$0
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(=) Assessed Value:	=	\$229,510

## Taxing Jurisdiction

Owner: ZULUAGA LUZ E  
% Ownership: 100.0000000000%  
Total Value: \$229,510

Entity	Description	Tax Rate	Appraised Value	Taxable Value	Estimated Tax	
06	BEXAR CO RD & FLOOD	0.023668	\$229,510	\$229,510	\$54.32	
08	SA RIVER AUTH	0.018580	\$229,510	\$229,510	\$42.64	
09	ALAMO COM COLLEGE	0.149150	\$229,510	\$229,510	\$342.31	
10	UNIV HEALTH SYSTEM	0.276235	\$229,510	\$229,510	\$633.99	
11	BEXAR COUNTY	0.276331	\$229,510	\$229,510	\$634.21	
21	CITY OF SAN ANTONIO	0.558270	\$229,510	\$229,510	\$1,281.28	
56	NORTHSIDE ISD	1.261300	\$229,510	\$229,510	\$2,894.81	
CAD	BEXAR APPRAISAL DISTRICT	0.000000	\$229,510	\$229,510	\$0.00	
<b>Total Tax Rate:</b>		<b>2.563534</b>				
						<b>Taxes w/Current Exemptions:</b> \$5,883.56
						<b>Taxes w/o Exemptions:</b> \$5,883.56

## Improvement / Building

<b>Improvement #1:</b> Residential State Code: A1 Living Area: 1630.0 sqft Value: \$171,270
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Type	Description	Class CD	Exterior Wall	Year Built	SQFT
LA	Living Area	A - AB		1959	1630.0
PA	Terrace (patio slab)	A - AB		1959	112.0
UTL	Attached Utility	A - NO		1959	176.0
AG	Attached Garage	A - AB		1959	220.0
OP	Attached Open Porch	A - NO		1959	20.0

<b>Improvement #2:</b> Residential State Code: A1 Living Area: sqft Value: \$900
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Type	Description	Class CD	Exterior Wall	Year Built	SQFT
RSH	Shed	A - NO		0	100.0

<b>Improvement #3:</b> Residential State Code: A1 Living Area: sqft Value: \$900
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Type	Description	Class CD	Exterior Wall	Year Built	SQFT
RSH	Shed	A - NO		0	100.0

## Land

#	Type	Description	Acres	Sqft	Eff Front	Eff Depth	Market Value	Prod. Value
1	RES	R/1 Family not Farm Single	0.1956	8520.00	71.00	120.00	\$56,440	\$0

## Roll Value History

Year	Improvements	Land Market	Ag Valuation	Appraised	HS Cap	Assessed
2022	\$173,070	\$56,440	0	229,510	\$0	\$229,510

Year	Total Assessed Value	Total Tax	Exempt	Total Taxable Value	Exempt Tax	Total Tax
2021	\$139,530	\$46,890	0	186,420	\$0	\$186,420
2020	\$140,560	\$36,260	0	176,820	\$0	\$176,820
2019	\$148,040	\$23,930	0	171,970	\$0	\$171,970
2018	\$145,500	\$23,930	0	169,430	\$12,611	\$156,819

### Deed History - (Last 3 Deed Transactions)

#	Deed Date	Type	Description	Grantor	Grantee	Volume	Page	Deed Number
1	2/8/2022	SWD	Special Warranty Deed	MENTOR CAPITAL LLC	ZULUAGA LUZ E			20220033014
2	8/22/2021	SWD	Special Warranty Deed		MENTOR CAPITAL LLC			20210311163
3	8/18/2021	SWD	Special Warranty Deed	WENDELL JOSIE M	MENTOR CAPITAL LLC			20210311162

**2022 data current as of Jun 15 2022 1:17AM.**

**2021 and prior year data current as of Jun 3 2022 6:28AM**

**For property information, contact (210) 242-2432 or (210) 224-8511 or email.**

**For website information, contact (210) 242-2500.**